

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS LICENSING AND DEVELOPMENT, Plaintiff, v. ZTE CORPORATION, ZTE (USA) INC., AND ZTE (TX), INC., Defendant.	Case No. 6:20-cv-00487-ADA Case No. 6:20-cv-00488-ADA Case No. 6:20-cv-00489-ADA Case No. 6:20-cv-00490-ADA Case No. 6:20-cv-00491-ADA Case No. 6:20-cv-00492-ADA Case No. 6:20-cv-00492-ADA Case No. 6:20-cv-00493-ADA Case No. 6:20-cv-00494-ADA Case No. 6:20-cv-00496-ADA Case No. 6:20-cv-00497-ADA
JURY TRIAL DEMANDED	

JOINT CASE READINESS STATUS REPORT

TO THE HONORABLE COURT:

Plaintiff WSOU Investments, LLC and Defendants ZTE Corporation, ZTE (USA) Inc, and ZTE (TX) Inc. hereby provide the following status report in advance of the initial Case Management Conference (CMC).

FILING AND EXTENSIONS

Plaintiff WSOU filed 11 complaints in the above-numbered cases on June 3, 2020. Through extension, Defendants filed Motions to Dismiss or Transfer on October 9, 2020. Through extensions, Plaintiff's deadline to respond the Motions to Dismiss is November 9, 2020.

RESPONSES TO THE COMPLAINTS

Defendants filed Motions to Dismiss or Alternatively Transfer all of the cases on October 9, 2020.

PENDING MOTIONS

Each Defendant filed Motions to Dismiss or Alternatively Transfer in each of the 11 cases challenging the venue as improper. There are no other pending motions. With the granted extensions, Plaintiff has until November 9 to respond.

RELATED CASES IN THIS JUDICIAL DISTRICT

The above-numbered cases were all filed by Plaintiff against Defendants in this District. There are no known related cases.

IPR, CBM, AND OTHER PGR FILINGS

There are no known IPR, CBM, or other PGR filings with respect to the patents asserted in the above-numbered cases.

NUMBER OF ASSERTED PATENTS AND CLAIMS

Plaintiff has asserted one patent in each of the above 11 suits; Plaintiff has not yet disclosed its asserted claims. Plaintiff will timely serve its infringement contentions including the asserted claims pursuant to any order set forth in the Order Governing Proceedings.

APPOINTMENT OF TECHNICAL ADVISOR

The parties believe appointment of a technical adviser would be beneficial due to the highly technical aspects of these cases.

MEET AND CONFER STATUS

The parties raise the following pre-*Markman* issues:

Conduct of Markman Hearing – the parties understand that the Court has scheduled these cases for *Markman* on May 20-21, 2021. The parties are meeting and conferring and will make a proposal to the Court for orderly presentation of the claim construction issues presented in the above-numbered cases over the two days allocated for hearing.

Protective Order – the parties anticipate submitting a proposed form of protective/confidentiality order, or their limited disputes regarding such an order, in the coming days.

Date: October 20, 2020

Respectfully submitted,

By: /s/ James L. Etheridge

James L. Etheridge
Texas Bar No. 24059147
Ryan S. Loveless
Texas Bar No. 24036997
Brett A. Mangrum
Texas Bar No. 24065671
Travis L. Richins
Texas Bar No. 24061296
Jeff Huang
Etheridge Law Group, PLLC
2600 E. Southlake Blvd., Suite 120 / 324
Southlake, TX 76092
Tel.: (817) 470-7249
Fax: (817) 887-5950
Jim@EtheridgeLaw.com
Ryan@EtheridgeLaw.com
Brett@EtheridgeLaw.com
Travis@EtheridgeLaw.com
Jeff@EtheridgeLaw.com

Mark D. Siegmund
State Bar No. 24117055
mark@waltfairpllc.com
Law Firm of Walt, Fair PLLC.
1508 North Valley Mills Drive
Waco, Texas 76710
Telephone: (254) 772-6400
Facsimile: (254) 772-6432

Counsel for Plaintiff WSOU Investments, LLC

/s/ Erick Robinson
Dunlap, Bennett & Ludwig PLLC

Erick Robinson
State Bar No. 24039142
7215 Bosque Blvd.,
Waco, TX 76710
Telephone: (254) 870-7302
Facsimile: (713)583-9737
Email:erobinson@dbllawyers.com

David R. Keesling,
OK Bar No. 17881
Timothy S. Kittle,
OK Bar No. 219796660
South Sheridan Road, Suite 250
Tulsa, Oklahoma 74133
(918) 998-9350 Telephone
(918) 998-9360 –Facsimile
dkeesling@dbllawyers.com
kittle@dbllawyers.com

Attorneys for Defendants